

DOCKETED**11-AFC-02**

TN # 69332

JAN. 30 2013

STATE OF CALIFORNIA**Energy Resources Conservation and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION FOR
 THE HIDDEN HILLS SOLAR ELECTRIC
 GENERATING SYSTEM (SEGS)

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DOCKET NO. 11-AFC-2

**PETITION TO INTERVENE BY
 THE COUNTY OF INYO,
 A POLITICAL SUBDIVISION OF THE STATE OF CALIFORNIA**

January 30, 2013

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**PETITION TO INTERVENE BY
THE COUNTY OF INYO,
A POLITICAL SUBDIVISION OF THE STATE OF CALIFORNIA**

Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulation, the County of Inyo, a Political Subdivision of the State of California, petitions to intervene in this proceeding.

The County of Inyo is a political subdivision of the State of California and is the second largest county in the State of California, encompassing over 10,000 square miles. Its population is the fourth smallest in the state, home to approximately 18,000 residents. The vast majority of the County's land is owned and operated by the US Forest Service, Bureau of Land Management, the National Park Service, California State Lands Commission and the City of Los Angeles, with only 1.7% of the County's total land in private ownership. The City of Bishop is the only incorporated city, located in the most northern portion of the County.

The proposed Hidden Hills Solar Energy Generating System (HHSEGS) is sited in the south-east portion of Inyo County. Directly across from the project site sits the residential community of Charleston View. Because of the low median income, this community and the nearby communities of Tecopa and Shoshone are classified as disadvantaged communities under standards adopted by the California Department of Water Resources. Consequently, the project raises environmental justice concerns with respect to these communities.

The project site lies over 200 miles from the Owens Valley, home to over 82% of the County's residents and the location of the County seat in Independence and the County's population center in Bishop. Limited County services in the project area are provided through five (5) full-time positions operating out of satellite offices located in Tecopa and Shoshone.

If approved, the County will bear the burden of providing governmental services necessary to serve the project, its employees, the residents and visitors to this remote region of the County. Those services include, but are not limited to, law enforcement, roads, social services, waste management, weed management, environmental health services and libraries. This project will directly impact the County's provision of services in this remote area, presents potentially significant impacts to the County's limited

supply of private lands and, due to the project's location, will result in environmental justice impacts on the nearby disadvantaged communities. The County has a vested interest in assuring that the service related cost impacts of this project are fully absorbed by the project proponent and not borne by the citizens of Inyo County. Moreover, the County has a vested interest in assuring that its limited supply of private property is used in a manner which maximizes its economic benefit to the County.

In addition to the County's interest in assuring the service related impacts are fully mitigated, the County is committed to protecting its natural resources from further negative impacts. Over the last century, the County has experienced the impacts to its environment and citizens from exportation of groundwater. The proposed project requests approval to use groundwater resources from an aquifer which is already in overdraft. The County has a vested interest in assuring that the project's use of groundwater does not adversely affect either local well owners or the environment.

The interests of the County of Inyo and its citizens are directly affected by the proposed project. These interests include, but are not limited to, the impacts to the residents of Charleston View, environmental justice impacts, County services, the County's private property resources and its groundwater resources. The County of Inyo has actively participated in these proceedings since the applicant's filing of its Application for Certification. The County now wishes to fully participate in these proceedings as a party.

Filings in this matter shall be served on the County of Inyo to the following individuals. Email service is preferred.

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This petition to intervene is timely and in light of the County's active participation in these proceedings will not prejudice any party.

For the foregoing reasons, the County of Inyo, a political subdivision of the State of California, respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow the County of Inyo to participate as a party.

Dated: January 30, 2013

Respectfully submitted,



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DECLARATION OF SERVICE

CASE NAME: *APPLICATION FOR CERTIFICATION FOR THE HIDDEN HILLS SOLAR
ELECTRIC GENERATING SYSTEM*

DOCKET NUMBER: Before the Energy Resources conservation and Development Commission of
the State of California Docket No. 11-AFC-02

I am employed in the County of Inyo, I am over the age of 18 years and I am not a party to
the within entitled action. My business address is 163 May Street, Bishop, CA 93514.

On , I served the foregoing document(s) described as follows:

**PETITION TO INTERVENE BY
THE COUNTY OF INYO,
A POLITICAL SUBDIVISION OF THE STATE OF CALIFORNIA**

on all parties in said action, by causing a true copy thereof to be transmitted by email and mail as
shown on attached,

AND

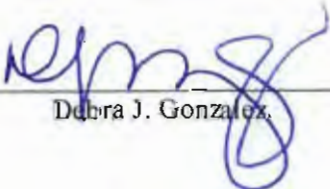
☒ (By Mail) I personally deposited said envelope(s) with the United States Postal Service at
Bishop, California, with first class postage thereon fully prepaid.

☐ (By Mail) I deposited such envelope(s) in the mail at **Independence**, California. I am
readily familiar with the County's practice whereby the mail, after being placed in a
designated area, is given the appropriate first class postage and is deposited with the United
States Postal Service on that same day.

☒ (By e-mail) a true copy to party(ies) listed.

I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct.

DATED: January 30, 2013



Debra J. Gonzalez.

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COMMISSION DOCKET UNIT

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Attn: Docket No. 12-CAI-04
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